

1 ROB L. PHILLIPS  
2 Nevada Bar No. 8225  
3 Rob.phillips@fisherbroyles.com  
4 FISHERBROYLES, LLP  
5 5670 Wilshire Blvd.  
6 Suite 1800  
7 Los Angeles, California 90036  
8 Telephone: (702) 518-1239  
9 *Counsel for Plaintiff*

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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 WEBSITE MANAGEMENT SYSTEMS,  
14 LLC, a Nevada Limited Liability  
15 Company

16 Case No.: 2:20-cv-00213

17 Plaintiff,  
18 v.  
19 BENJAMIN DAILEDA, an individual  
20 residing in Nevada, MELVIN OMAN, an  
21 individual residing in Nevada, DEVAN  
22 HIRST, an individual residing in Nevada,  
23 YES WE WILL, INC., a Nevada  
24 Corporation, and DOES 1-X,

25 **DECLARATION OF CHRISTINE  
26 MACLOLEK IN SUPPORT OF MOTION  
27 FOR PRELIMINARY INJUNCTION**

28 Defendants.

18 **DECLARATION**

19 I, Christine Maclolek, declare as follows:

20 1. I am the Assistant Client Services Manager for Website Management Systems,  
21 LLC (“WMS”). I was hired by WMS on February 1, 2019.

22 2. On January 22, 2020, Fely Alzona, an existing customer of WMS, contacted me  
23 and asked why she was being contacted by another company about the same search engine  
24 optimization services she had signed up with WMS to provide after she was told that WMS  
25 provides unique services.

26 3. Fely Alzona identified 1<sup>st</sup> Page Group as the entity that contacted her inquiring  
27 about providing the search engine optimization services and asking her to leave WMS. Fely

1 Alzona also detailed 1<sup>st</sup> Page Group using the same sales pitch, pitch materials, including website  
2 demo, and search engine optimization process as WMS.

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4 I declare under penalty of perjury pursuant to the laws of the United States of America that  
5 the foregoing is true and correct.

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7 Dated: March 2, 2020  
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CHRISTINE MACOLEK

FISHERBROOKS, LLP  
3670 Wilshire Blvd., Suite 1800  
Los Angeles, CA 90036  
Telephone: (702) 518-1239